



FILED

06-15-07

12:03 PM

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the)	
Commission's Own Motion into the Service)	R.02-12-004
Quality Standards for All Telecommunications)	(Filed December 5, 2002)
Carriers and Revisions to General Order 133-B.)	
_____)	

**REPLY COMMENTS OF VERIZON WIRELESS ON
ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO**

Suzanne Toller
Gregory J. Kopta
DAVIS WRIGHT TREMAINE LLP
505 Montgomery St., Suite 800
San Francisco, CA 94111-6533
Telephone: (415) 276-6500
E-Mail: suzannetoller@dwt.com
E-Mail: gregkopta@dwt.com

John T. Scott, III
William D. Wallace
VERIZON WIRELESS
1300 I Street, NW - Suite 400 West
Washington, DC 20005
Telephone: (202) 589-3790
E-Mail: John.Scott@VerizonWireless.com
E-Mail: Bill.Wallace@VerizonWireless.com

Attorneys for Verizon Wireless, Inc.

Dated: June 15, 2007

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the)	
Commission's Own Motion into the Service)	R.02-12-004
Quality Standards for All Telecommunications)	
Carriers and Revisions to General Order 133-B.)	
_____)	

**REPLY COMMENTS OF VERIZON WIRELESS ON
ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO**

Pursuant to the March 30, 2007 Assigned Commissioner's Ruling and Scoping Memo of Commissioner Chong in the above-captioned proceeding ("ACR"), Verizon Wireless¹ submits the following comments in reply to other parties' opening comments concerning wireless service quality issues.

I. INTRODUCTION

The ACR observes that the "goal of state policy is to rely on competition, wherever possible, to promote broad consumer interests," and thus "the Commission's approach to reviewing service quality should determine what service quality data and reports are needed to provide relevant information to the Commission as to consumer experiences regarding the quality of communications services so that the Commission can assess whether the competitive market adequately protects California consumers."² Verizon Wireless explained in its Opening Comments that, consistent with that approach, the Commission should recognize that the competitive market for wireless services already generates more than sufficient information on customer experiences regarding the quality of wireless services and that accordingly the

¹ Verizon Wireless is the d/b/a for the following entities: Cellco Partnership (U-3001-C), Los Angeles SMSA Limited Partnership (U-3003-C), Verizon Wireless (VAW) LLC (U-3029-C), Fresno MSA Limited Partnership (U-3005-C), Sacramento Valley Limited Partnership (U-3004-C), GTE Mobilnet of California Limited Partnership (U-3002-C), GTE Mobilnet of Santa Barbara Limited Partnership (U-3011-C), Modoc RSA Limited Partnership (U-3032-C), California RSA No. 4 Limited Partnership (U-3038-C) and Cal-One Cellular Limited Partnership (U-3036-C).

² ACR at 3.

Commission should not collect, create, or require wireless carriers to disclose any information purporting to show service quality. Most commenting parties agree.³

Two parties supported new information requirements for wireless carriers. The Utility Reform Network (“TURN”) proposes that the Commission adopt new service quality performance measures and metrics for wireless service, while the Division of Ratepayer Advocates (“DRA”) would have the Commission require wireless service providers to disclose engineering maps detailing signal strength and coverage area⁴. Neither of these proposals is consistent with the stated approach in the ACR, nor would either approach provide the Commission and consumers with information that is better than that currently available in the competitive marketplace for wireless services. Rather, both proposals would have the Commission unnecessarily intervene in a fully competitive market that is successfully informing consumers of their wireless service options.

The Commission’s objective is, and should be, to apply regulation only where it is needed to ensure that consumers receive fair, just, and reasonable telecommunications service. The wireless service market is a tribute to the ability of competitive markets to satisfy consumer demands both for information about available alternatives and for quality service. TURN and DRA provide no evidence that the measuring, reporting, or disclosure requirements they advocate will provide any tangible benefit for consumers or otherwise justify the associated

³ A few commenters rather perfunctorily suggested they were not opposed to customer satisfaction surveys, but none of those parties attempted to justify their positions in any depth or addressed the extensive data on wireless customer satisfaction that is currently available. In its Opening Comments, Verizon Wireless explained in detail the enormous breadth and scope of such information, the lack of any need for additional surveys, and the inherent risks and problems associated with Commission involvement in picking winners and losers in an already highly competitive market. The Utility Reform Network also agreed that customer satisfaction surveys are of marginal utility. (TURN Opening Comments at 16-18). Verizon Wireless will not repeat that discussion here but focuses instead on the proposals and arguments that were raised in other parties’ opening comments.

⁴ DRA also proposes to have wireless carriers file certain outage reports with the Commission. Verizon Wireless already files information with the Federal Communications Commission and should not be required to separately file such information with the Commission.

burden and expense to the Commission and wireless service providers. Indeed, consumers now have access to better means of obtaining information on wireless carriers and service than would be provided under the DRA and TURN proposals. The Commission, therefore, should refuse to adopt those proposals.

II. DISCUSSION

A. The CPUC is Under No Legal Obligation to Promulgate Service Quality Standards for Wireless Service Providers.

TURN begins its comments with the admonition that “the Legislature has made it a statutory imperative that the Commission ensure that California consumers have access to high quality services, and information enabling them to make informed choices.”⁵ The Commission needs no such reminder. The Commission has repeatedly shown that it takes its statutory and consumer protection responsibilities very seriously. The Commission, however, is also fully aware of the scope of its obligations and should reject TURN’s assertion that “the requirement for the Commission to promulgate service quality standards for all providers of voice services and make information relating to such standards publicly available is not permissive, but mandatory.”⁶

The statute to which TURN refers imposes no such requirement. Public Utilities Code Section 2896 provides in relevant part:

The commission **shall require telephone corporations to provide** customer service to telecommunications customers that includes, but is not limited to, all of the following:

(a) Sufficient information upon which to make informed choices among telecommunications services and providers. This includes, but is not limited to, information regarding the provider’s identity, service options, pricing, and terms and conditions of service

⁵ TURN Opening Comments at 2.

⁶ *Id.* at 3.

(c) Reasonable statewide service quality standards, including, but not limited to, standards regarding network technical quality, customer service, installation, repair, and billing. (Emphasis added.)

The statute expressly states that the Commission must require telecommunications *companies* to provide sufficient information upon which to make informed choices and reasonable statewide service quality standards. Nothing in the statute mandates that the Commission must prescribe the information or promulgate the service quality standards the companies provide.

Even if the Commission were to interpret the statute as requiring or authorizing the Commission to prescribe information carriers must provide their customers or to promulgate service quality standards, the Commission should do so only consistent with the legislature's intent. The Commission has recognized that intent as being to "rely on competition"⁷ and "to protect consumers by requiring telecommunications corporations to provide consumers with a minimum level of information."⁸ As discussed in Verizon Wireless' Opening Comments, competition in the wireless services market has resulted in the availability of information far in excess of what consumers need to make informed choices. Any further service quality disclosure requirements or standards thus would be inconsistent with the Commission's and the legislature's reliance on competition to provide consumers with the information they need to make informed choices.

Commission promulgation of the service quality standards for wireless carriers like those TURN proposes, moreover, would conflict with federal law and be preempted. As Verizon Wireless explained in its 2003 comments, 47 U.S.C. Section 332(c)(3)(A) prohibits state "entry regulation," which includes regulating the "modes and conditions under which" a wireless carrier

⁷ D.06-08-030, mimeo at 4-5.

⁸ D.01-09-058, mimeo at 16.

is entitled to offer its service within any given locality within the state.⁹ Wireless service quality standards and metrics, in particular, would constitute just such regulation by requiring wireless carriers to adjust and maintain their facilities to measure and meet those standards and metrics. Moreover, the Federal Communications Commission (“FCC”) has asserted exclusive federal jurisdiction over technical standards for wireless networks¹⁰, and TURN’s California-specific operational requirements would be preempted. TURN fails to even address these jurisdictional issues. Particularly in light of the express statutory language and, as discussed below, the lack of any demonstrable need for wireless service quality standards or metrics, the Commission should not interpret state law to mandate that the Commission promulgate such requirements.

B. The Service Quality Standards Proposed for Wireless Carriers by TURN are Anachronistic, Unnecessary and Jurisdictionally Suspect.

Verizon Wireless and most other commenters have explained in detail in their prior comments, including the original comments filed in April and May 2003, why establishing service quality standards for wireless carriers reflects an outdated view of the Commission’s regulatory role, is unnecessary, would raise more issues than it would resolve, and would threaten to tread on the FCC’s exclusive jurisdiction.¹¹ TURN, however, ignores the earlier comments and recommends that the Commission establish specific and largely unique metrics for allegedly measuring wireless service quality, including “call success rate,” “service coverage,” “call drop out,” “average wait time to speak with a live agent,” “CPUC complaints per million customers,” “percent of calls receiving busy signal,” and “percent of calls abandoned.” TURN proposes that the Commission engage in wireless service quality monitoring comparable to programs established in Singapore and the United Kingdom. TURN’s

⁹ Verizon Wireless Comments at 12-16 (April 1, 2003); Verizon Wireless Reply Comments at 12-16 (May 5, 2003).

¹⁰ *Id.*

¹¹ *Id.*

proposals are out of step with the statute, the Commission's goals in this proceeding, and the very marketplace TURN purports to be trying to protect.

TURN contends that “the essence of the competitive market” is consumer access to sufficient information to make informed choices among alternative services and service providers,¹² but TURN fails to mention, much less consider, the information on wireless service quality that is already publicly available without government intervention.¹³ Several private companies already rank, measure, and report wireless customer satisfaction – including the call performance and reliability factors that comprise most of TURN's proposed measures. These circumstances stand in sharp contrast to those in Singapore and the UK, where a basic Internet search reveals no comparable level of private industry evaluation of wireless customer satisfaction. To the extent that TURN's concern is to ensure that consumers have access to the information they need, the marketplace is currently satisfying that concern.

TURN, however, goes further by seeking to have the Commission establish itself as the ultimate arbiter of wireless service quality by adopting specific benchmarks that providers must meet or exceed. TURN claims that this approach will ensure “high quality telecommunications” and prevent low quality, “no frills” service from arising.¹⁴ This is mid-twentieth century monopoly regulatory thinking at its worst. Differentiation among carriers' service offerings, including “no frills” and premium services is exactly what a competitive market should produce and should be available to consumers.¹⁵ Moreover, TURN's proposal is based on the perverse

¹² TURN Opening Comments at 5.

¹³ In its comments TURN also elevates a single characteristic of wireless service – service quality – above all others, ignoring study after study that demonstrates that there are other factors, including price, that consumers consider when selecting a carrier. *See e.g.* ConsumerReports.org, Cellphones Service, How to Choose.

¹⁴ TURN Opening Comments at 7.

¹⁵ Declaration of Dr. Debra J. Aron Supporting Opening Comments of Verizon California at 33-34.

premise that that increased competition requires increased regulation¹⁶ – a premise that is directly at odds with the Commission’s policy and that of the California Legislature.¹⁷

TURN produces no evidence whatsoever that the level of wireless service quality in California is somehow deficient or that TURN’s proposed metrics would equate to providing high quality service.¹⁸ Nor does TURN provide any justification for its apparent belief that the Commission, rather than California consumers, is in a better position to determine when wireless service quality has reached an acceptable level. The wireless service market has enjoyed tremendous growth in the past few years without any Commission service quality standards, and there is no reason to believe that the Commission would or could improve consumer participation in that market by imposing any such standards.

TURN also largely ignores the practical problems with its proposal. While candidly conceding that the Commission is unlikely to “institute a government sponsored testing program as in Singapore,” TURN suggests that the Commission could work in conjunction with a third party to conduct “voice call testing across the [state] using automated testing equipment mounted in vehicles” as is done in the UK or “could require wireless carriers to make their own service quality measurements publicly available with random third party verification of service quality to ensure data reliability and objectivity.”¹⁹ Both of TURN’s suggested alternatives create more problems than they resolve.

Commission sponsored “drive tests” create the same problems as Commission sponsored surveys. As Verizon Wireless explained in its opening comments, having the Commission pick

¹⁶ TURN Comments at 4-5 (“TURN submits that these service quality standards are even more important and relevant today as the telecommunications market becomes more competitive.”)

¹⁷ See, e.g. D.06-08-030 (URF Decision), mimeo at 4-5, 32-36 and Pub. Util. Code § 709.5

¹⁸ Aron Declaration at 31-33.

¹⁹ TURN Opening Comments at 13.

winners and losers is at odds with the Commission's role as a regulatory agency and could distort the working of the competitive market. This is especially true when the test TURN proposes the Commission use as a model is – by design – limited to certain routes which may or may not be representative of an individual carrier's level of service across a given market or the state. Consumers do not care if their wireless phone works along a randomly selected route that the Commission or a third party survey firm picks. What they care about is whether the phone will work along the routes they take – to work, to school, to visit friends and family. There is no way that a Commission-sponsored drive test will provide this information. Instead the best way for a customer to get this information is to try out the phone he or she wants to use along the routes traveled – something which the consumer can do with Verizon Wireless' and other carriers' trial periods.

TURN's alternative recommendation to use individual wireless service provider data subject to random third party verification is equally problematic. Wireless service providers, unlike wireline carriers, do not measure and report service quality data for regulatory purposes. No standard measuring and reporting system comparable to ARMIS exists in the wireless industry. Rather, the wireless companies monitor their networks for their own internal business purposes. Such information is proprietary and is gathered by a company for its own purposes, not for public education, and would not be fully comparable to data collected by other providers.²⁰

Finally, TURN fails to acknowledge that its service quality standard and metrics proposal would effectively require substantial modification to wireless networks, and the Commission lacks jurisdiction to require wireless service providers to modify their networks to measure and

²⁰ See *e.g.*, section C.2 below, explaining that wireless carriers use different standards for what constitutes in-building versus in-vehicle coverage.

report on service quality issues or to remedy any alleged service quality deficiencies.²¹ As Verizon Wireless explained in its original opening and reply comments in this docket, federal law preempts state-level entry regulation, including the modes and conditions under which a wireless carrier is entitled to offer its service within any given locality within the state.²² TURN does not even attempt to explain how its proposed service quality measures and metrics would pass muster under the applicable preemption analysis.

C. The Commission Should Reject DRA’s Proposal to Require Disclosure of Engineering Coverage Maps.

The ACR sought comment on whether the proposals it discusses address the concerns identified in D.04-09-062, the Commission order resolving an investigation of Cingular Wireless (now AT&T Mobility). The concerns raised in that decision were resolved by that decision and do not impact this proceeding. DRA disagrees and devotes an entire, separate set of comments to its recommendation “that the Commission require wireless service providers to post on their Internet sites and make available in their stores coverage maps of the same *granularity* and accuracy as used by their engineers.”²³ Neither D.04-09-062 nor DRA’s comments justify Commission adoption of that recommendation.

1. The Wireless Industry Long Ago Addressed Any Commission Concerns with Respect to Consumer Access to Coverage Information.

D.04-09-062 focused on Cingular’s practice (at the time of the Commission investigation) of not allowing returns or refunds or a trial period for its wireless services, even though, the Commission found, Cingular knew about service quality problems and was

²¹ See TURN Opening Comments at 6-7.

²² Verizon Wireless Comments at 12-16 (April 1, 2003); Verizon Wireless Reply Comments at 12-16 (May 5, 2003).

²³ DRA Opening Comments on Wireless Coverage Maps at 3 (emphasis in original).

experiencing “significant network development growing pains.”²⁴ The Commission concluded that this practice, and a “pattern and practice of failing to disclose known network problems to customers resulted in a failure to provide adequate, just, and reasonable service.”²⁵ Neither DRA nor any other commenting party has produced any evidence that any wireless carrier currently maintains any such practices. DRA, however, focuses on language in the decision deferring to this proceeding “resolution of the prospective standards for customer notification of coverage and capacity.”²⁶ DRA interprets this language and the Commission’s discussion of the record in that case as a conclusion that consumers need better access to existing wireless coverage data.

The competitive market for wireless services has eliminated the policy concerns raised in D.04-09-062 about consumer access to coverage and capacity information. Cingular itself modified practices and implemented a refund/return policy in May 2002.²⁷ Today all of the other major wireless carriers have a trial period in place which allows cancellation during an initial period without payment of an early termination fee. Moreover, some carriers offer customers even more, again as a result of the working of the competitive market. For example Verizon Wireless’ current trial period provides that “[i]f the customer is not satisfied and takes his/her active line of service to another wireless carrier during the first 30 days after activation, Verizon Wireless will issue a credit for all the calls the customer made, along with the customer’s monthly access and activation fees.”²⁸ This aptly named “Test Drive” program recognizes that

²⁴ D.04-09-062, mimeo at 2.

²⁵ *Id.*, mimeo at 82 (Conclusions of Law 2 & 3).

²⁶ *Id.* at 70.

²⁷ *E.g.*, D.04-09-062, mimeo at 2.

²⁸ http://support.vzw.com/faqs/Wireless%20Service/30_test_drive.html. In the Test Drive program, if a new customer ports out to another carrier within 30 days of activation, Verizon Wireless will refund money for calls (including access charge and per minute charges for exceeding Anytime Minute allowance), activation fee, applicable taxes associated with credits, and certain Verizon Wireless fees. Data charges, 411 Connect, roaming charges, long distance charges and certain other Verizon Wireless surcharges and customer selected services are not

personal experience and use of the network is the best information for customers to use to decide whether that service is right for them. The marketplace, not Commission intervention, thus is addressing Commission concern about consumer access to information about the performance of the network.

2. Consumers Do Not Need Engineering Maps of Wireless Networks to Make Fully Informed Decisions.

In reliance on its flawed premise concerning the continuing viability of the Commission's policy concern in D.04-09-062, DRA asserts that consumers want and need engineering maps depicting wireless signal strength and coverage data. That assertion is as flawed as DRA's premise.

DRA provides only anecdotal and outdated factual support for consumers' alleged need for engineering level coverage maps. DRA quotes from the customer complaints filed over five years ago that gave rise to the investigation resolved by D.04-09-062 but provides no current customer complaints. Nor do any of the declarations appended to DRA's comments in this proceeding provide any information about customer need for engineering-level coverage maps. This lack of current factual support is not surprising in light of the coverage information that is currently available.

Verizon Wireless, for example, includes coverage maps on its website.²⁹ The map can be magnified to street level or expanded to show entire regions. DRA has produced no evidence that consumers find these maps insufficient or misleading. Rather, DRA contends that these maps are "entirely devoid of topographical realism" and do not provide "sufficient detail to allow

eligible for credit in the Test Drive program. Verizon Wireless also accepts return of equipment purchased from Verizon Wireless that meets Test Drive criteria. Details on the Test Drive program can be found on the Verizon Wireless website.

²⁹ Maps are also provided in calling plan brochures and in the confirmation letters sent to subscribers.

consumers to make meaningful purchase decisions based on the quality of the wireless provider's signal coverage.”³⁰ There is no evidence, however, that consumers need “topographical realism” to make meaningful purchase decisions. To the contrary, consumers have access not only to the coverage maps but to a multitude of customer service satisfaction surveys, their own personal experience using the phone for up to 30 days, and the experience of friends, family and co-workers. In this regard it is surprising that DRA completely ignores the wealth of information that is available to potential subscribers from other current subscribers. The real life experiences of family, friends, neighbors, and co-workers is a valuable resource for new subscribers and one that new customers often cite as their reason for switching providers. Plus, wireless phones generally have a visual display of signal availability that consumers can consider even when not making calls. DRA has not – and cannot – demonstrate that engineering-level maps would provide any more or better data for making meaningful purchase decisions than the information currently available.³¹

DRA also ignores the practical problems with its proposal to require disclosure of engineering-level maps. Wireless providers prepare engineering maps for internal purposes of assessing, maintaining, and building their networks, not as public information for consumers. Wireless network maps are no less proprietary and competitively sensitive than maps of *wireline* networks. DRA dismisses such concerns of proprietary information as “untenable as a matter of law and policy that wireless service providers be able to wrap *essential service characteristics of a generally available consumer product* in the mantle of a trade secret.”³² But, the exact same

³⁰ DRA Opening Comments on Wireless Coverage Maps at 8.

³¹ DRA's suggestion that Verizon Wireless provides more mapping information to consumers in AVC states is simply wrong. (DRA Opening Comments on Wireless Coverage Maps at 11.) The same map formats are used in AVC and non-AVC states.

³² DRA Opening Comments on Wireless Coverage Maps at 12 (emphasis in original).

argument could be made for disclosure of the location and nature of *wireline* facilities to ensure consumers are aware of whether sufficient capacity exists in the network to enable timely installation, maintenance, repair, and quality of landline service, but DRA does not propose such disclosure. Nor should it. Customers care about the service quality they receive, not the specifics of the network designed and built to provide that service.

DRA nevertheless contends that engineering maps are useful and understandable – again with no empirical support. DRA simplistically points to Cingular’s maps with their various color codings for “good in-building,” “good in-car,” “open-air only,” or “no” coverage. No standard industry definitions exist for these terms. What is “good in-building” coverage for one company might be considered only “good in-car” coverage for another. Or a company may use different terminology altogether or may use numbers to show relative signal strength. Consumers thus are more likely to be confused than enlightened by comparing engineering maps from different wireless providers.

Adding to the customer confusion arising from DRA’s proposal is the fact that coverage and signal strength can vary depending on a variety of conditions, not all of which are within the service provider’s control. Verizon Wireless offers several caveats associated with its coverage maps on its website, which explain factors that affect coverage, including:

Verizon Wireless coverage depictions in the rate and coverage maps are based on generally accepted engineering predictive and modeling tools, used to measure radio frequency transmissions from cell towers. Our rate and coverage maps depict wireless coverage based on predictive modeling parameters determined by our network engineers.

Since wireless service is transmitted on a radio signal over the airways, it is subject to network and transmission limitations such as cell site availability (particularly near boundaries and in remote areas).

Your wireless equipment, weather, topography and other environmental considerations associated with radio technology, also affects wireless service. For example, your wireless phone may work perfectly driving home one night, but then not work as well driving in the same place the next night during a thunderstorm. Additionally, service may vary significantly within buildings.³³

It should also be noted that wireless coverage maps may include coverage based on information from a carrier's roaming partners, and the principal carrier cannot vouch for the accuracy of that information.

The more detailed the map, the more sensitive it will be to these variations – and the potentially more confusing it will be to consumers, for example, if they were not to receive a signal when that map claimed that signal coverage would be “good.” Maps cannot, substitute for actual experience, which remains the best source of information on wireless service coverage. For this reason, a trial period remains a more significant source of information for consumers than a coverage map even with the level of detail requested by DRA. Coverage maps certainly provide useful information to consumers, and so, all the major carriers provide them with varying levels of detail for predicted signal availability. The coverage map combined with a trial period provides the information consumers need to make an informed decision.

Commission regulation should be reserved for cases of market failure. No such market failure exists with respect to the information that consumers need to make informed decisions about wireless service. Verizon Wireless and other wireless service providers compete based in large part on the quality of the service they provide. J.D. Power and Associates confirms that call performance and reliability is increasingly the most important factor in assessing customer

³³ <http://www.verizonwireless.com/b2c/coveragelocator/mapInformation.jsp>

satisfaction.³⁴ The market has responded to such consumer demand by making rate and coverage maps available in conjunction with third party surveys of wireless customer satisfaction and 30 day trials in which customers can gather their own information on whether service from a particular company will fill their needs. The availability of this wealth of information is a market success, and more than adequately demonstrates that a Commission mandate for disclosure of engineering maps – or adoption of any other wireless service quality standards – is wholly unnecessary at best, and fraught with legal and practical problems.

III. CONCLUSION

For the foregoing reasons, the Commission should not impose any service quality standards or disclosure requirements, including but not limited to those proposed by TURN and DRA in their respective opening comments, on wireless service providers.

Respectfully submitted:

/s/ Suzanne Toller

Suzanne Toller

Gregory J. Kopta

DAVIS WRIGHT TREMAINE LLP

505 Montgomery St., Suite 800

San Francisco, CA 94111-6533

Telephone: (415) 276-6500

E-Mail: suzannetoller@dwt.com

E-Mail: gregkopta@dwt.com

John T. Scott, III

William D. Wallace

VERIZON WIRELESS

1300 I Street, NW - Suite 400 West

Washington, DC 20005

Telephone: (202) 589-3790

E-Mail: John.Scott@VerizonWireless.com

E-Mail: Bill.Wallace@VerizonWireless.com

Dated: June 15, 2007

Attorneys for Verizon Wireless, Inc.

³⁴ <http://www.jdpower.com/press-releases/pressrelease.aspx?id=2007058>

CERTIFICATE OF SERVICE

I, Judy Pau, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 505 Montgomery Street, Suite 800, San Francisco, California 94111-3834.

On June 15, 2007, I caused the following to be served:

**REPLY COMMENTS OF VERIZON WIRELESS ON
ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO**

via electronic mail to all parties on the service list R.02-12-004 who have provided the Commission with an electronic mail address and by First class mail on the parties listed as "Appearance" and "State Service" on the attached service list who have not provided an electronic mail address.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on the date above at San Francisco, California.

_____/s/ Judy Pau_____
Judy Pau

VIA U.S. Mail

Commissioner Michael R. Peevey
Administrative Law Judge Michelle Cooke

VIA FIRST CLASS MAIL

Mark Aashby
Cingular Wireless
5565 Glenridge Connector, Ste. 1700
Atlanta, GA 30342

Michael Manchester
1749 10th Street, No. 1
Santa Monica, Ca 90404

Alejandro Jimenez
AT&T Mobility
12900 Park Plaza Drive
Tustin, CA 90703

M. Estela Lara
Centro La Familia Advocacy Services, Inc
2014 Tulare Street, Suite 711
Fresno, CA93721

Andrea Johnson
AT&T California
525 Market Street, Suite 1944
San Francisco, Ca 94105

Robert N. Kittel
U.S. Army Litigation Center
The United States Dept. Of Defense
901 N. Stuart Street, Suite 700
Arlington, VA 22203-1837

VIA E-MAIL

charak@nclc.org; barbalex@ctel.net; william_mosca@cable.comcast.com;
laura.holloway@nextel.com; terrance.spann@hqda.army.mil; channon@aarp.org;
jpfaff01@sprintspectrum.com; ann.johnson@verizon.com; john.sisemore@att.com;
katherine.mudge@covad.com; rex.knowles@xo.com; alp@msk.com;
lbiddle@ferrisbritton.com; mshames@ucan.org; litkin@cricketcommunications.com;
mdjoseph@adamsbroadwell.com; bfinkelstein@turn.org; cmailloux@turn.org;
elaine.duncan@verizon.com; rcosta@turn.org; rudy.reyes@verizon.com;
bnusbaum@turn.org; chh@cpuc.ca.gov; jjz@cpuc.ca.gov; mlm@cpuc.ca.gov;
sjy@cpuc.ca.gov; ksritchey@jonesday.com; rdeutsch@sidley.com;
steve.bowen@bowenlawgroup.com; david.discher@att.com; gregory.castle@att.com;
jparker@wafs.com; mwand@mofo.com; stephen.h.kukta@sprint.com;
thomas.selhorst@att.com; jwmctarnaghan@duanemorris.com; glenn@stoverlaw.net;
pcasciato@sbcglobal.net; ckomail@pacbell.net; dbosco@hklaw.com; jim@tobinlaw.us;
smalllecs@cwclaw.com; jclark@goodinmacbride.com; jwiedman@goodinmacbride.com;
mschreiber@cwclaw.com; deyoung@caltel.org; sleeper@steefel.com; Toller, Suzanne;
ens@loens.com; John_Gutierrez@cable.comcast.com; anitataffrice@earthlink.net;
Douglas.Garrett@cox.com; Jose.Jimenez@Cox.com; ashm@telepacific.com;
grs@calcable.org; lmb@wblaw.net; ll@calcable.org; esprague@pacwest.com;
gayatri@jbsenergy.com; ldelacruz@aarp.org; cindy.manheim@cingular.com;
rspangler@snavely-king.com; Bill.Wallace@VerizonWireless.com;
mflood@harriswiltshire.com; mike.romano@level3.com; kevin.saville@frontiercorp.com;
marjorie.herlth@qwest.com; aloa.stevens@frontiercorp.com; christina.tusan@doj.ca.gov;
pam@consumerwatchdog.org; jacque.lopez@verizon.com; esther.northrup@cox.com;
michael.bagley1@verizonwireless.com; thomas.mahr@verizonwireless.com;
mmulkey@arrival.com; jan.hewitt@att.com; ono@att.com; yvette.hogue@att.com;
info@tobiaslo.com; mday@gmssr.com; sbeatty@cwclaw.com; Pau, Judy; Nelson, Katie;
ts2942@camail.sbc.com; kristin.jacobson@nextel.com; mp@calcable.org;
pucservice@dralegal.org; jthierio@pacwest.com; jthierio@pacwest.com; cborn@czn.com;
mcf@calcomwebsite.com; Susan.Lipper@T-Mobile.com;
sheila.harris@integratelecom.com; Adam.Sherr@qwest.com; aisar@millerisar.com;
jsp@cpuc.ca.gov; wit@cpuc.ca.gov; dgp@cpuc.ca.gov; dsa@cpuc.ca.gov;
man@cpuc.ca.gov; fua@cpuc.ca.gov; jlg@cpuc.ca.gov; jml@cpuc.ca.gov;
knr@cpuc.ca.gov; ljw@cpuc.ca.gov; lsy@cpuc.ca.gov; bor@cpuc.ca.gov; rs1@cpuc.ca.gov;
hey@cpuc.ca.gov; sbs@cpuc.ca.gov; jwh@cpuc.ca.gov

CALIFORNIA PUBLIC UTILITIES COMMISSION
SERVICE LISTS

Proceeding: R0212004 - PUC - SERVICE QUALIT

Filer: PUC

List Name: INITIAL LIST

Last changed: May 17, 2007

APPEARANCE

CHARLES HARAK
NATIONAL CONSUMER LAW CENTER
77 SUMMER STREET, 10TH FLOOR
BOSTON, MA 02110

BARBARA R. ALEXANDER
CONSUMER AFFAIRS CONSULTANT
83 WEDGEWOOD DRIVE
WINTHROP, ME 04364

WILLIAM K. MOSCA
COMCAST BUSINESS COMMUNICATIONS, INC.
10 INDEPENDENCE WAY
WARREN, NJ 07059

LAURA L. HOLLOWAY
NEXTEL COMMUNICATIONS, INC.
2001 EDMUND HALLEY DRIVE
RESTON, VA 20091

TERRANCE SPANN
US ARMY LEGAL SERVICES AGENCY
DEPARTMENT OF THE ARMY (JALS-RL)
901 N. STUART STREET, SUITE 700
ARLINGTON, VA 22203-1837

CORALETTE HANNON
ESQUIRE
AARP LEGISLATIVE REPRESENTATIVE
6705 REEDY CREEK ROAD
CHARLOTTE, NC 28215

MARK ASHBY
CINGULAR WIRELESS
5565 GLENRIDGE CONNECTOR, STE 1700
ATLANTA, GA 30342

JEFFREY M. PFAFF
SPRINT PCS
KSOPHN0212-2A509
6450 SPRINT PARKWAY
OVERLAND PARK, KS 66251-6100

ANN JOHNSON
VERIZON
HQE02F61
600 HIDDEN RIDGE
IRVING, TX 75038

JOHN SISEMORE
DIRECTOR
AT&T SERVICES
175 E. HOUSTON STREET, ROOM 10-M-10
SAN ANTONIO, TX 78205

KATHERINE K. MUDGE
SENIOR COUNSEL
COVAD COMMUNICATIONS COMPANY
7000 NORTH MOPAC EXPRESSWAY, 2D FL
AUSTIN, TX 78731

REX KNOWLES
REGIONAL VICE PRESIDENT
XO COMMUNICATIONS SERVICES, INC.
111 EAST BROADWAY, SUITE 1000
SALT LAKE CITY, UT 84111

ALAN L. PEPPER
MITCHELL SILBERBERG & KNUPP LLP
TRIDENT CENTER
11377 W OLYMPIC BLVD., SUITE 200
LOS ANGELES, CA 90064-1683

MICHAEL MANCHESTER
1749 10TH STREET, NO. 1
SANTA MONICA, CA 90404

ALEJANDRO JIMENEZ
AT&T MOBILITY
12900 PARK PLAZA DRIVE
TUSTIN, CA 90703

W. LEE BIDDLE
FERRIS AND BRITTON, APC
401 W. A ST., SUITE 1600
SAN DIEGO, CA 92101

MICHAEL SHAMES
ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103

LAURIE ITKIN
CRICKET COMMUNICATIONS, INC.
10307 PACIFIC CENTER COURT
SAN DIEGO, CA 92121

M. ESTELA LARA
CENTRO LA FAMILIA ADVOCACY SERVICES, INC
2014 TULARE STREET, SUITE 711
FRESNO, CA 93721

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD. STE 1000
SOUTH SAN FRANCISCO, CA 94080

BOB FINKELSTEIN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

CHRISTINE MAILLOUX
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

ELAINE M. DUNCAN
ATTORNEY AT LAW
VERIZON CALIFORNIA INC.
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

REGINA COSTA
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

RUDY REYES
VERIZON
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

WILLIAM NUSBAUM
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

CHARLYN A. HOOK
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JASON J. ZELLER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5030
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MONICA L. MCCRARY
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5134
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SINDY J. YUN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KATHERINE S. RITCHEY
ATTORNEY AT LAW
JONES DAY
555 CALIFORNIA STREET, 26TH FLOOR
SAN FRANCISCO, CA 94104

RANDOLPH W. DEUTSCH
ATTORNEY AT LAW
SIDLEY, AUSTIN, BROWN & WOOD, LLP
SUITE 2000
555 CALIFORNIA STREET
SAN FRANCISCO, CA 94104

STEPHEN B. BOWEN
ATTORNEY AT LAW
INC.
BOWEN LAW GROUP
235 MONTGOMERY STREET, SUITE 920
SAN FRANCISCO, CA 94104

AGNES NG
AT&T COMMUNICATIONS OF CALIFORNIA,
525 MARKET ST 20TH FLOOR 4
SAN FRANCISCO, CA 94105

ANDREA JOHNSON
AT&T CALIFORNIA
525 MARKET STREET, SUITE 1944
SAN FRANCISCO, CA 94105

DAVID P. DISCHER
GENERAL ATTORNEY
AT&T CALIFORNIA
525 MARKET STREET, ROOM 2027
SAN FRANCISCO, CA 94105

GREGORY L. CASTLE
SENIOR COUNSEL
AT&T CALIFORNIA
525 MARKET STREET, RM. 2022
SAN FRANCISCO, CA 94105

JEAN PARKER
WORKING ASSETS
101 MARKET STREET, SUITE 700
SAN FRANCISCO, CA 94105

MARY E. WAND
ATTORNEY AT LAW
MORRISON & FOERSTER LLP
425 MARKET STREET
SAN FRANCISCO, CA 94105

STEPHEN H. KUKTA
COUNSEL
SPRINT NEXTEL
201 MISSION STREET, SUITE 1400
SAN FRANCISCO, CA 94105

THOMAS J. SELHORST
AT&T CALIFORNIA
525 MARKET STREET, RM. 2023
SAN FRANCISCO, CA 94105

JAMES W. MCTARNAGHAN
ATTORNEY AT LAW
DUANE MORRIS LLP
ONE MARKET, SPEAR TOWER 2000
SAN FRANCISCO, CA 94105-1104

GLENN STOVER
ATTORNEY AT LAW
STOVER LAW
221 MAIN STREET, SUITE 800
SAN FRANCISCO, CA 94105-1906

PETER A. CASCIATO
ATTORNEY AT LAW
PETER A. CASCIATO P.C.
355 BRYANT STREET, SUITE 410
SAN FRANCISCO, CA 94107

CARL K. OSHIRO
ATTORNEY AT LAW
CSBRT/CSBA
100 PINE STREET, SUITE 3110
SAN FRANCISCO, CA 94111

DOUGLAS H. BOSCO
HOLLAND & KNIGHT, LLC
50 CALIFORNIA STREET, SUITE 2800
SAN FRANCISCO, CA 94111

JAMES M. TOBIN
ESQUIRE
TWO EMBARCADERO CENTER, SUITE 1800
SAN FRANCISCO, CA 94111

JEFFREY F. BECK
ATTORNEY AT LAW
COOPER, WHITE & COOPER, L.L.P.
201 CALIFORNIA ST., 17TH FLOOR
SAN FRANCISCO, CA 94111

JOHN CLARK
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
LAMPREY LLP
505 SANSOME STREET, 9TH FLOOR
SAN FRANCISCO, CA 94111

JOSEPH F. WIEDMAN
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY &
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

LUIS ARTEAGA
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

SARAH DEYOUNG
EXECUTIVE DIRECTOR
CALTEL
50 CALIFORNIA STREET, SUITE 1500
SAN FRANCISCO, CA 94111

SARAH E. LEEPER
ATTORNEY AT LAW
STEEFEL, LEVITT & WEISS
ONE EMBARCADERO CENTER, 30TH FLOOR
SAN FRANCISCO, CA 94111

SUZANNE TOLLER
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

EARL NICHOLAS SELBY
ATTORNEY AT LAW
LAW OFFICES OF EARL NICHOLAS SELBY
418 FLORENCE STREET
PALO ALTO, CA 94301

JOHN GUTIERREZ
DIRECTOR, GOVERNMENT AFFAIRS
COMCAST PHONE OF CALIFORNIA, LLC
12647 ALCOSTA BLVD., SUITE 200
SAN RAMON, CA 94583

ANITA C. TAFF-RICE
ATTORNEY AT LAW
1547 PALOS VERDES MALL, SUITE 298
WALNUT CREEK, CA 94597

DOUG GARRETT
COX CALIFORNIA TELCOM LLC
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608

JOSE JIMENEZ
COX CALIFORNIA TELCOM, L.L.C.
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608

MARILYN ASH
U.S. TELEPACIFIC CORP.
6101 CHRISTIE AVE.
EMERYVILLE, CA 94608

GLENN SEMOW
CALIFORNIA CABLE & TELECOMM. ASSOC.
360 22ND STREET, STE. 750
OAKLAND, CA 94612

LEON M. BLOOMFIELD
ATTORNEY AT LAW
WILSON & BLOOMFIELD, LLP
ASSOCIATION
1901 HARRISON STREET, SUITE 1620
OAKLAND, CA 94612

LESLA LEHTONEN
VP LEGAL AND REGULATORY AFFAIRS
CALIFORNIA CABLE & TELECOM
360 22ND STREET, SUITE 750
OAKLAND, CA 94612

ETHAN SPRAGUE
PAC-WEST TELECOMM, INC.
1776 W. MARCH LANE, SUITE 250
STOCKTON, CA 95207

GAYATRI SCHILBERG
JBS ENERGY
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95605

LUPE DE LA CRUZ
AARP CALIFORNIA
1415 L ST STE 960
SACRAMENTO, CA 95814-3977

CINDY MANHEIM
CINGULAR WIRELESS
PO BOX 97061
REDMOND, WA 98073-9761

INFORMATION ONLY

ROBERT SPANGLER
SNAVELY ING & MAJOROS O'CONNOR & LEE INC
1220 L STREET N.W. SUITE 410
WASHINGTON, DC 20005

WILLIAM D. WALLACE ESQ.
VERIZON WIRELESS
1300 I STREET, N.W., SUITE 400 WEST
WASHINGTON, DC 20005

MAUREEN K. FLOOD
TELECOM POLICY ANALYST
HARRIS, WILTSHIRE & GRANNIS LLP
1200 EIGHTEENTH STREET, NW
WASHINGTON, DC 20036

MICHAEL R. ROMANO
DIRECTOR-STATE REGULATORY AFFAIRS
LEVEL 3 COMMUNICATIONS, LLC
2300 CORPORATE PARK DR STE. 600
HERNDON, VA 20171-4845

ROBERT N. KITTEL
U.S. ARMY LITIGATION CENTER
901 N. STUART STREET, SUITE 700
ARLINGTON, VA 22203-1837

KEVIN SAVILLE
ASSOCIATE GENERAL COUNSEL
FRONTIER COMMUNICATIONS
2378 WILSHIRE BLVD.
MOUND, MN 55364

MARJORIE O. HERLTH
QWEST COMMUNICATIONS CORPORATION
AFFAIRS
1801 CALIFORNIA ST., SUITE 4700
DENVER, CO 80202

ALOA STEVENS
DIRECTOR, GOVERNMENT&EXTERNAL
FRONTIER COMMUNICATIONS
PO BOX 708970
SANDY, UT 84070-8970

CHRISTINA V. TUSAN
ATTORNEY AT LAW
CALIFORNIA DEPARTMENT OF JUSTICE
RIGHTS
300 SOUTH SPRING ST., 11TH FLOOR
LOS ANGELES, CA 90012

PAMELA PRESSLEY
LITIGATION PROGRAM DIRECTOR
FOUNDATION FOR TAXPAYER&CONSUMER
1750 OCEAN PARK BLVD., SUITE 200
SANTA MONICA, CA 90405

JACQUE LOPEZ
LEGAL ASSISTANT
VERIZON CALIFORNIA INC
CA501LB
112 LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

ESTHER NORTHRUP
COX CALIFORNIA TELCOM
5159 FEDERAL BLVD.
SAN DIEGO, CA 92105

MICHAEL BAGLEY
VERIZON WIRELESS
15505 SAND CANYON AVENUE

THOMAS MAHR
VICE PRESIDENT AND GENERAL COUNSEL
VERIZON WIRELESS

IRVINE, CA 92612

15505 SAN CANYON AVE E305
IRVINE, CA 92618

MIKE MULKEY
ARRIVAL COMMUNICATIONS
1807 19TH STREET
BAKERSFIELD, CA 93301

JAN HEWITT
AT&T CALIFORNIA
REGULATORY DEPT.
525 MARKET ST., ROOM 1803
SAN FRANCISCO, CA 94105

TERESA M. ONO
AT&T COMMUNICATIONS OF CALIFORNIA, INC.
525 MARKET ST. 18TH FLOOR, 4
SAN FRANCISCO, CA 94105

YVETTE HOGUE
EXECUTIVE DIRECTOR
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1918
SAN FRANCISCO, CA 94105-2727

MARGARET L. TOBIAS
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE
LAMPREY LLP
SAN FRANCISCO, CA 94107

MICHAEL B. DAY
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY &
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

SEAN P. BEATTY
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA ST., 17TH FLOOR
SAN FRANCISCO, CA 94111

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

KATIE NELSON
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

TERRENCE E. SCOTT
SBC ADVANCED SOLUTIONS, INC.
2623 CAMINO RAMON, ROOM 2C111
SAN RAMON, CA 94583

KRISTIN JACOBSON
MARKET ATTORNEY, CONSULTANT
ASSOCIATION
NEXTEL OF CALIFORNIA, INC.
1255 TREAT BLVD., SUITE 800
WALNUT CREEK, CA 94596

MARIA POLITZER
CALIFORNIA CABLE & TELECOM
360 22ND STREET, NO. 750
OAKLAND, CA 94612

MELISSA W. KASNITZ
DISABILITY RIGHTS ADVOCATES

JOSH P. THIERIOT
REGULATORY TEAM

2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204

PAC-WEST TELECOMM
1776 W. MARCH LANE, SUITE 250
STOCKTON, CA 95207

JOSH THIERIOT
PAC-WEST TELECOMM, INC.
1776 W. MARCH LN, STE. 250
TELECOMMUNICATIONS
STOCKTON, CA 95207

CHARLES E. BORN
MANAGER-STATE GOVERNMENT AFFAIRS
FRONTIER, A CITIZENS

PO BOX 340
ELK GROVE, CA 95759

MARGARET FELTS
PRESIDENT
CALIFORNIA COMMUNICATIONS ASSN
1851 HERITAGE LANE STE 255
SACRAMENTO, CA 95815-4923

SUSAN LIPPER
SENIOR MANAGER, GOVERNMENT AFFAIRS
T-MOBILE USA, INC.
1755 CREEKSIDE OAKS DIVE, SUITE 190
SACRAMENTO, CA 95833

SHEILA HARRIS
MANAGER, GOVERNMENT AFFAIRS
INTEGRA TELECOM HOLDINGS, INC.
1201 NE LLOYD BLVD., STE.500
PORTLAND, OR 97232

ADAM L. SHERR
ATTORNEY AT LAW
QWEST COMMUNICATIONS CORPORATION
1600 7TH AVENUE, 3206
SEATTLE, WA 98191-0000

ANDREW O. ISAR
DIRECTOR-STATE AFFAIRS
ASSOCIATION OF COMMUNICATIONS ENTERPRISE
7901 SKANSIE AVE., SUITE 240
GIG HARBOR, WA 98335

STATE SERVICE

JOEY PERMAN
CALIF PUBLIC UTILITIES COMMISSION
MARKET STRUCTURE BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

CHRIS WITTEMAN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5129
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DALE PIIRU
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DANA APPLING
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF RATEPAYERS ADVOCATES
ROOM 4201
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DENISE MANN
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRAN
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

FALINE FUA
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JANICE L. GRAU
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5011
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOHN M. LEUTZA
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS DIVISION
ROOM 3210
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KAREN MILLER
CALIF PUBLIC UTILITIES COMMISSION
PUBLIC ADVISOR OFFICE
ROOM 2103
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LINDA J. WOODS
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LINETTE YOUNG
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ISSUES BRA
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARY JO BORAK
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RICHARD SMITH
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5019
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RUDY SASTRA
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARITA SARVATE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JAMES W. HOWARD
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814